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Attorneys for Defendants Patrick Allen, Sajel Hathi, Dolores Matteucci, and Sara Walker

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDER
SERVICES, INC., and A.J. MADISON,

Plaintiffs,

v.

SAJEL HATHI, in her official capacity as
head of the Oregon Health Authority, and
SARA WALKER in her official capacity as
Interim Superintendent of the Oregon State
Hospital,

Defendants.

JAROD BOWMAN, JOSHAWN DOUGLAS-
SIMPSON,

Plaintiffs,

v.

SARA WALKER, Interim Superintendent of
the Oregon State Hospital, in her official

Case No. 3:02-cv-00339-AN (Lead Case)
Case No. 3:21-cv-01637-AN (Member Case)
Case No. 6:22-CV-01460-AN (Member Case)

DEFENDANTS' MOTION FOR EXTENSION
OF TIME TO RESPOND TO SHOW CAUSE
MOTION

Case No. 3:21-cv-01637-AN (Member Case)

capacity, DOLORES MATTEUCCI, in her individual capacity, SAJEL HATHI, Director of the Oregon Health Authority, in her official capacity, and PATRICK ALLEN in his individual capacity,

Defendants.

LEGACY EMANUEL HOSPITAL & HEALTH CENTER d/b/a UNITY CENTER FOR BEHAVIORAL HEALTH; LEGACY HEALTH SYSTEM; PEACEHEALTH; and PROVIDENCE HEALTH & SERVICES OREGON,

Plaintiffs,

v.

SAJEL HATHI, in her official capacity as Director of Oregon Health Authority,

Defendant.

Case No. 6:22-CV-01460-AN (Member Case)

CERTIFICATE OF CONFERRAL

Counsel for defendants has conferred with counsel for Plaintiffs and they do not oppose this motion.

MOTION

Defendants' response to plaintiff DRO's show-case motion seeking a contempt finding and a remedial order (ECF #149) is currently due on January 21, 2025. Defendants request that this deadline be extended one week, to January 28, 2025, because lead defense counsel, Ms. Scott, is out of the office on bereavement leave, and defendants require additional time to prepare their response. Defendants also note that they will be requesting an evidentiary hearing on DRO's motion to be set after briefing is completed. This request is made in good faith and not for purposes of undue delay.

Additionally, defendants' work toward returning to compliance is continuing during this time, and defendants will file a substantive status report on or before 9 a.m. on January 23, 2025.

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CAS/j3b/981165366

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DATED January 16, 2025.

Respectfully submitted,

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s/ Jill O. Conbere

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